

EXHIBIT E

Subject: In re: Flint Water Litigation--Subpoena to Nicole Flotteron
Date: Monday, July 10, 2023 at 7:18:14 PM Eastern Daylight Time
From: Steven Paradise
To: Corey Stern, Melanie Daly
CC: Amber Henry
Attachments: image001.jpg

Corey and Melanie,

I understand that you have been attempting to serve a subpoena on former Actum partner Nicole Flotteron. I am writing to advise that we will be representing Ms. Flotteron and are prepared to accept service, with the understanding that we reserve the right to move for a protective order, move to quash, or for any other appropriate relief. We would also like to agree in advance that if Ms. Flotteron is required to testify, the scope of her testimony will be limited to the scope to which we agreed for Mr. McKeon. Finally, I trust based on our past dealings that you will work with me to find a mutually convenient date for my client and me, should she be required to appear.

Please let me know if you have any questions.

Regards,



EISNER, LLP

Steven Paradise

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